

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION**

BARBARA STURGIS, Individually and as	)	
Administrator of the Estate of DAVID	)	
STURGIS, Deceased,	)	
	)	CASE NO.: 3:19-cv-00440-DRL-MGG
Plaintiff,	)	
	)	
v.	)	
	)	
R&L CARRIERS INC., R&L TRANSFER,	)	
INC., GREENWOOD MOTOR LINES,	)	
INC.,	)	
	)	
Defendants.	)	

**DEFENDANTS' F.R.E. 702 MOTION TO EXCLUDE TESTIMONY  
OF PLAINTIFF'S PROPOSED EXPERT**

Defendants, R & L Carriers, Inc., R & L Transfer, Inc., Greenwood Motor Lines, Inc., by counsel, Edward W. Hearn, Gregory D. Conforti, and Catherine A. Breitweiser-Hurst of JOHNSON & BELL, P.C., pursuant to *Federal Rule of Evidence* 702, respectfully move this Court to exclude plaintiff's expert, David S. Gibson for failing to meet the standard for admissibility under *Fed. R. Evid. 702* as clarified by Daubert and its progeny. Defendants submit a Memorandum in Support of this Motion, with Exhibits, separately.

WHEREFORE, Defendants respectfully request the Court to exclude the opinions of plaintiff's expert witness Mr. David S. Gibson and for all other relief that is just and proper.

Respectfully submitted,

JOHNSON & BELL, P.C.

By: /s/Edward W. Hearn  
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**CERTIFICATE OF SERVICE**

I certify that on February 1, 2021, we filed the foregoing document using this Court's CM/ECF system and this document was served on all counsel of record through the Court's CM/ECF system. Parties may access the pleading through the Court's CM/ECF online system.

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